

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

UNITED STATES OF AMERICA,)	
)	
<i>Appellee,</i>)	
)	
v.)	No. 22-4242
)	
ZACKARY ELLIS SANDERS,)	
)	
<i>Defendant-Appellant.</i>)	

**JOINT MOTION FOR EXTENSION OF
DEADLINES IN THE BRIEFING SCHEDULE**

The United States of America and Defendant-Appellant Zackary Ellis Sanders respectfully move this Court, pursuant to Rule 26(b) of the Federal Rules of Appellate Procedure and Rule 31(c) of the Local Rules of the Fourth Circuit, for a 21-day extension of the government’s deadline to file its response brief under the current briefing schedule and an additional 10-day extension of Appellant’s deadline to file a reply brief. The government’s response brief is currently due on July 7, 2022, and Appellant’s reply brief is currently due 10 days from service of response brief. Doc. 11. With the jointly requested extension, the government’s response brief would be due on July 28, 2022, and Appellant’s reply brief would be due 20 days from service of the response brief, or August 17, 2022 at the latest.

The United States has not previously sought an extension in this appeal. The record in this matter is extensive and Appellant’s appeal raises a number of issues.

While the government is proceeding diligently in preparing its response brief, unforeseen circumstances have arisen in government counsel's work schedule that will require significant travel over the coming weeks, in addition to undersigned government counsel's ongoing responsibilities in other cases. Further, given Appellant's incarceration and prior difficulty in discussing the briefing in this matter with Appellant, an additional 10-day extension of the deadline to file Appellant's reply brief is necessary to ensure that Appellant has an adequate opportunity to review any reply brief with counsel.

Accordingly, the parties submit that the requested extensions to the response brief and reply brief deadlines will assist in the efficient and appropriate presentation of issues to this Court. With the jointly requested extension, the government's response brief would be due on July 28, 2022, and Appellant's reply brief would be due 20 days from service of the response brief, or August 17, 2022 at the latest.

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

I certify that this motion does not exceed 5,200 words (and is specifically 311 words) and complies with the requirements of Fed. R. App. P. 27.

/s/

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